

1 Marc Wolstenholme
2 5 Shetland Close
3 Coventry, England CV5 7LS
4 Telephone: 044 7827964404
5 Email: marc@mwwolf-fiction.co.uk
6 Plaintiff in Pro Per

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S STATEMENT OF ARCANE-
RELATED EXPANSION AND
CONTINUING IP INFRINGEMENT

Dated this: April 21, 2025



[MARC WOLSTENHOLME]

1 **TO THE HONORABLE COURT:**

2 **I. Introduction**

3 Plaintiff submits this statement to detail Riot Games' ongoing and expanding
4 monetization of Arcane-related intellectual property (IP), which continues to infringe upon
5 Plaintiff's rights. Despite misleading public narratives suggesting limited profitability, Riot has
6 systematically leveraged Arcane across various platforms and products, generating substantial
7 revenue and reinforcing the need for comprehensive discovery and appropriate remedies.

9

10 **II. Riot's Monetization Strategies and Revenue Streams**

11

12

13 **A. High-End In-Game Cosmetics**

14 Riot has introduced premium Arcane-themed in-game cosmetics within League of
15 Legends, employing gacha-style mechanics that encourage repeated purchases. Notably, certain
16 skins have been priced up to \$250, with acquisition chances tied to randomized systems, leading
17 to potential expenditures exceeding \$400 for a single item.

19

20 **B. Merchandise Collaborations and Sales**

21 Riot has expanded Arcane's presence through various merchandise collaborations:

- 22 - Fenty Beauty x Arcane: A limited-edition makeup collection priced at \$250.
23
24 - UNIQLO UT Collection: Apparel featuring Arcane characters.
25
26 - BlackMilk Clothing: Fashion items inspired by Arcane.
27
28 - Heroes & Villains: Lifestyle gear and accessories themed around Arcane.

1 - Amazon and Redbubble: Arcane-inspired merchandise like posters and
2 collectibles.

- 3 - Ambessa: Chosen of the Wolf – A League of Legends: Arcane novel.
4 - The Art and Making of Arcane Book by Elisabeth Vincentelli.

5
6 C. Home Media Releases

7 GKIDS has produced and distributed Arcane Season 1 in various formats:

- 8 - 4K UHD Steelbook Edition: \$59.98 with exclusive designs and content.
9 - Blu-ray Editions: Standard and Collector's Editions (\$34.96–\$150).

10
11 D. Licensing Agreements

12 Riot secured licensing deals for Arcane's distribution:

- 13 - Netflix: \$3 million per episode.
14 - Tencent: \$3 million per episode.

15
16 III. Implications for Plaintiff's Claims

17 The extensive commercialization of Arcane underscores the ongoing exploitation
18 of Plaintiff's IP. Riot's strategic partnerships, high-priced in-game items, and diverse
19 merchandise offerings demonstrate a concerted effort to monetize the Arcane brand beyond the
20 original scope, thereby exacerbating the infringement and necessitating a reevaluation of
21 damages and remedies. Moreover, Arcane acted as a promotional tool to an aging brand and it
22

1 also fleshed out characters from cardboard to what they are now, which has allowed Riot to
2 expand into many other industries, perhaps saving the company in the long run.
3
4

5 **IV. Request for Relief**

- 6 - Expanded Discovery: To uncover the full extent of revenues from Arcane-
7 related products and collaborations.
8 - Injunctive Relief: To prevent further unauthorized use and commercialization of
9 Plaintiff's IP.
10 - Accounting and Damages: A comprehensive accounting of profits from Arcane,
11 with appropriate compensation.

1 **Appendix A – List of Arcane-Related Products, Media, and Collaborations**
2
3
4

5 **I. In-Game Content**
6
7
8
9
10
11

- League of Legends – Arcane Skins: Jinx, Vi, Caitlyn, Jayce, etc.
- League of Legends – Characters: Mel Medarda, Ambessa Medarda, etc.
- League of Legends – Arcane-themed in-game events and missions, etc.
- Teamfight Tactics – Arcane-themed sets, Little Legends, Arena cosmetics.
- Legends of Runeterra – Arcane characters, event cards.
- Project K, new card game.
- VALORANT – Arcane Collector's Set (weapons, cards, sprays).
- 2XKO – Upcoming fighting game using Arcane-inspired narrative tone.
- Cannon lore infused into all Riot Games products.
- Backstories of all key characters derived from Bloodborg.

12
13
14
15
16
17 **II. Cinematics and Narrative Spin-Offs**
18
19

- Welcome to Noxus (2025 Cinematic) – Expanding Arcane into Noxian storyline.
- Blood, Sweat & Tears (Music Video) – Origin of Mel & Ambessa.
- Noxus Series – Continuation of Mel Medarda's arc.
- Ionia Series – Mystical storylines and expansion.
- Demacia Series – Magic, honor, and political themes.

1 **III. Merchandise and Commercial Collaborations**

- 2 - Fenty Beauty x Arcane: A limited-edition makeup collection priced at \$250.
3 - UNIQLO UT Collection: Apparel featuring Arcane characters.
4 - BlackMilk Clothing: Fashion items inspired by Arcane.
5 - Heroes & Villains: Lifestyle gear and accessories themed around Arcane.
6 - Amazon and Redbubble: Arcane-inspired merchandise like posters and
7 collectibles.

8 - Ambessa: Chosen of the Wolf – A League of Legends: Arcane novel.

9
10 **IV. Licensing and Streaming Deals**

- 11
12 - Netflix – \$3 million per episode
13 - Tencent – \$3 million per episode

14
15 **V. Riot Development Projects Enabled by Arcane**

- 16
17 - 2XKO (Project L) – Narrative design from Arcane.
18 - Vietnam-Based Live Action Film – Centered on Mel and other Arcane lore.
19 - New Animation Studios – Built due to Arcane's success.
20 - Retconning of League of Legends lore to align with Arcane.
21 - Multi-billion-dollar new projects greenlit off Arcane metrics.

1 **VI. Economic Impact Summary**

- 2 - Combined production/marketing cost: ~\$250 million (estimated).
- 3 - Netflix & Tencent licensing revenue: ~\$108 million.
- 4 - Undisclosed in-game monetization profits (Arcane skins, loot systems).
- 5 - Profits from live events, merchandise, cross-promotional sales.
- 6 - Arcane's success elevated Riot to narrative animation industry leader.
- 7 - Expansion into film, TV, and lifestyle sectors likely saved Riot long-term.

1 **Declaration of Authenticity:**

2 I, Marc Wolstenholme, declare under penalty of perjury that the statements made
3 are true and accurate

5 Executed on April 21, 2025, in Coventry, England.

6 Respectfully submitted,

7 Signature: *M.WOLSTENHOLME.*

10 Marc Wolstenholme

11 Plaintiff in Pro Per

12 5 Shetland Close

13 Coventry, England CV5 7LS

14 marc@mwwolf-fiction.co.uk